

## ESG POLICY

### 1 PURPOSE

Techstep aims to be a positive agent for change in society by actively promoting mobile technology that enable people to work smarter and more sustainable. The purpose of this policy is to reflect Techstep's commitment to responsible business practices with respect to people, environment and society.

### 2 SCOPE

Sustainability in Techstep is about creating business value to the benefit of key stakeholders such as customers, shareholders and employees, the environment and society. ESG is focusing on the way Techstep is doing business, disclosing the company's impact (risk and opportunities) on the environment and society, as well as its management practices for ensuring sound governance.

### 3 ROLES AND RESPONSIBILITIES

The board of directors has the overall responsibility for aligning Techstep's strategy and ESG considerations. Operationalising the principles into day-to-day operations lies with the CEO, supported by the executive management group.

The executive management sets overall goals and measures for their respective business units, which are anchored in the board. Each executive is responsible for communicating these to everyone in their respective business units and ensure compliance with this policy.

Techstep shall have a dedicated function to ensure sufficient focus on driving sustainability and advancing the company's ESG program.

### 4 APPROACH

- Techstep adheres to the United Nations Global Compact's 10 principles with respect to human rights, labour relations, anti-corruption and the environment
- Techstep supports the UNs 17 sustainable development goals and ambitions for 2030, and will contribute where possible to make a difference
- Techstep's work with social responsibility and sustainability is based on applicable laws, regulations and internationally recognised frameworks, the company's strategy and risk profile
- Techstep observes the Norwegian Code of Practice for Corporate Governance and comply with market practices for reporting ESG information, including Oslo Børs' guidance on ESG reporting

## 5 COMMITMENTS

Techstep's commitment to responsible business means that Techstep is committed to:

- Integrate sustainability into the group's business model, through the group's management system and document handling, and ensure this is reflected in investments, purchases, competence development and stakeholder relations
- Work systematically to minimise negative environmental or social impact from own operations, and seize opportunities for contributing to sustainable development
- Operate in line with fundamental human rights as laid down in the UN Guiding principles on Business and Human Rights, and promote the principles to business partners
- Observe the International Labour Organization's (ILO) fundamental conventions and attend to workers' rights through working with trade unions and by setting clear requirements for and monitoring suppliers
- Provide a safe, healthy, and inclusive working environment
- Offer equal opportunities irrespective of gender, age, sexual orientation, or cultural or religious background
- Treat all employees with understanding and respect, and encourage them to use their abilities in a way that contributes positively to own and company development
- Apply high ethical standards and oppose all forms of corruption and financial malpractice within own operations and in contact with partners and suppliers
- Carry out due diligence of own operations and its supply chain in accordance with the concepts and principles set forth in the UN Guiding Principles for Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct
- Communicate truthfully on Techstep's real impact on climate, the environment and human beings and avoid greenwashing
- Conduct materiality assessment to ensure efforts and resources are focused on ESG topics that has the greatest impact on the business or its stakeholders. The material topics shall be subject to frequent review, as what is considered material may change over time as the company develops or new regulations and requirements are introduced.
- Continuously follow-up material ESG factors and report annually in accordance to internationally recognised standards for sustainability reporting. Reporting shall include an assessment of results achieved and expected measures going forward.

## UPDATES

The ESG Policy shall be reviewed and updated annually or when considered necessary i.e., due to changes in laws or regulations.

### Change log

Version	Change	Prepared by	Approved by	Approval date
1.0	CSR policy (New)	CFO, Marius Drefvelin	Board of Directors	18 February 2018
2.0	CSR policy upgraded to ESG policy	Head of Sustainability/ESG & Compliance, Cathrine Birkenes	Board of Directors	10 February 2022
2.1	Simplified and clarified approach and commitments	Head of Sustainability/ESG & Compliance, Cathrine Birkenes	Board of Directors	16 February 2023